

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	)	Chapter 11
	)	
W.R. GRACE & CO., <u>et al.</u> ,	)	Case No. 01-1139 (JKF)
	)	Jointly Administered
Debtors.	)	<b>Objection Deadline: May 2, 2008 at 4:00 p.m.</b>
	)	<b>Hearing Date: May 19, 2008 at 1:00 p.m.</b>

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**NOTICE OF MOTION OF MIAN REALTY, LLC FOR ENTRY OF ORDER  
DECLARING THAT (i) THE AUTOMATIC STAY DOES NOT APPLY  
TO FILING OF ITS PROPOSED THIRD PARTY COMPLAINT  
AGAINST DEBTOR; AND (ii) DEBTOR'S OBLIGATION TO  
CLEANUP CERTAIN REAL PROPERTY DOES NOT  
CONSTITUTE A CLAIM UNDER THE BANKRUPTCY CODE**

TO: Parties on the attached service list

**PLEASE TAKE NOTICE** that on April 11, 2008, Mian Realty, LLC ("Mian"), by and through its attorneys, filed a Motion For Entry of Order Declaring that (i) the Automatic Stay Does Not Apply to the Filing of Its Proposed Third Party Complaint Against Debtor; and (ii) Debtor's Obligation to Cleanup Certain Real Property Does Not Constitute a Claim Under the Bankruptcy Code (the "Motion").

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the Motion or the relief requested therein must be made in writing and filed with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, Wilmington, Delaware 19801 (the "Bankruptcy Court"), and served upon the undersigned counsel, no later than 4:00 p.m. on May 2, 2008.

**PLEASE TAKE FURTHER NOTICE** that if no objections to the Motion are timely filed and served in accordance with the foregoing, an order granting the relief requested in the Motion may be granted without further notice or a hearing. If an objection to the Motion is

timely filed, a hearing will be held before the Honorable Judith K. Fitzgerald in the Bankruptcy Court, at 824 N. Market Street, Wilmington, Delaware, on May 19, 2008 at 1:00 p.m. (ET). Only written objections timely filed with the Bankruptcy Court and received by the undersigned counsel will be considered at that hearing.

Dated: April 11, 2008

**TRENK, DiPASQUALE, WEBSTER,  
DELLA FERA & SODONO, P.C.**

Richard D. Trenk

Henry M. Karwowski

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West Orange, NJ 07052

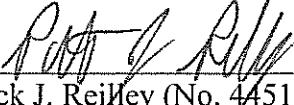
(973) 243-8600

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-and-

**COLE, SCHOTZ, MEISEL,  
FORMAN & LEONARD, PA**

By:

  
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Co-Counsel for Mian Realty, LLC

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